

Michael McKneely (State Bar No. 214896)
McKNEELY LAW FIRM
2300 Tulare Street, Suite 250
Fresno, California 93721
Telephone: (559) 443-7442
Facsimile: (559) 860-0150
mike@fresnocriminalattorney.com

Attorney for Defendant
ALEXANDER ALVES

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALEXANDER ALVES,

Defendant.

Case No. 1:23-CR-00145-NODJ-BAM

**AMENDED STIPULATION REGARDING
EXCLUDABLE TIME PERIODS UNDER
SPEEDY TRIAL ACT; AND ORDER**

Date: December 11, 2024
Time: 1:00 pm
Judge: Hon. Barbara A. McAuliffe

STIPULATION

The United States of America and Defendant Alexander Alves, through their respective counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on December 11, 2024.
2. By this stipulation, the parties agree to continue the status conference until March 26, 2025 in order for continued defense preparation and settlement discussions.
3. Mr. Alves requests that time be excluded between December 11, 2024 and March 26, 2025 under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].
4. The parties agree and stipulate and request that the Court find the following:
 - a) Defense counsel desires additional time to review the voluminous

discovery with his client, investigate available defenses and legal issues, and discuss potential resolution with the United States.

b) Defense counsel believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

c) The United States does not object to the continuance.

d) Based on the above-stated findings, the ends of justice served by continuing case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, *et seq.*, within which trial must commence, the time period of December 11, 2024 to March 26, 2025 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendants in a speedy trial.

IT IS SO STIPULATED

DATED: December 3, 2024

PHILLIP A. TALBERT
United States Attorney

By: s/ Stephanie M. Stokman by authorization
Stephanie M. Stokman
Assistant United States Attorney

DATED: December 3, 2024

McKNEELY LAW FIRM

By: s/ Michael McKneely
Michael McKneely
Attorneys for Alexander Alves

ORDER

IT IS SO ORDERED that the status conference is continued from December 11, 2024, to
March 26, 2025, at 1:00 p.m. in Courtroom 8 before Magistrate Judge Barbara A. McAuliffe.

Time is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv).

IT IS SO ORDERED.

Dated: **December 3, 2024**

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE

MCKNEELY LAW FIRM
2300 TULARE STREET, SUITE 250
FRESNO, CALIFORNIA 93721
TELEPHONE: (559) 443-7442
FACSIMILE: (559) 860-0150